IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI CENTRAL DIVISION

LEAGUE OF WOMEN VOTERS OF MISSOURI, ET AL.,

Plaintiffs,

v.

JOHN R. ASHCROFT, ET AL.,

Defendants.

No. 2:18-cv-04073-BCW

MOTION FOR ATTORNEYS' FEES

Pursuant to 52 U.S.C. § 20510(c), Plaintiffs move this Court for an award of reasonable attorneys' fees, including litigation expenses. For the reasons provided in their suggestions in support, Plaintiffs are the prevailing party in this case and entitled to an award of reasonable attorneys' fees. As explained in the accompanying suggestions, a reasonable attorneys' fee for this case is \$1,143,627.96 plus litigation expenses of \$27,484.15.

Plaintiffs are also entitled to an award of taxable costs. They have filed a bill of costs. ECF No. 151. To the extent any expenses were improperly included on the bill of costs, those expenses should be included as part of the attorneys' fee.

Respectfully Submitted,

/s/ Anthony E. Rothert
Anthony E. Rothert, #44827
Jessie Steffan, #64861
ACLU OF MISSOURI FOUNDATION

906 Olive Street, Suite 1130 St. Louis, MO 63101 Telephone: (314) 652-3114 Fax: (314) 652-3112 trothert@aclu-mo.org jsteffan@aclu-mo.org

Gillian R. Wilcox, #61278 ACLU OF MISSOURI FOUNDATION 406 W. 34th Street, Suite 420 Kansas City, MO 64111 Telephone: (816) 470-9938 gwilcox@aclu-mo.org

Denise D. Lieberman, #47013
Sabrina Khan*
ADVANCEMENT PROJECT
1220 L Street NW, Suite 850
Washington, DC 20005
Telephone: (314) 780-1833
Fax: (202) 728-9557
dlieberman@advancementproject.org
skhan@advancementproject.org

Naila S. Awan*
Miranda Galindo*
DĒMOS
80 Broad Street, 4th Floor
New York, NY 10004
Telephone: (212) 485-6065
nawan@demos.org
mgalindo@demos.org

Chiraag Bains (MA Bar No. 673627)* DĒMOS 740 6th Street NW, 2nd Floor Washington, DC 20001 Telephone: (202) 864-2746 cbains@demos.org

Davin M. Rosborough*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street
New York, NY 10004
Telephone: (212) 549-2613
drosborough@aclu.org

Sarah Brannon* **
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
915 15th Street, NW
Washington, DC 20005
Telephone: (202) 675-2337
sbrannon@aclu.org

Joshua B. Picker*
COVINGTON & BURLING LLP
620 Eighth Avenue
New York, NY 10018
Telephone: (212) 841-1000
Fax: (212) 841-1010
jpicker@cov.com

Attorneys for Plaintiffs

* Admitted pro hac vice

** Not admitted in the District of Columbia; practice limited pursuant to D.C. App. R. 49(c)(3).

CERTIFICATE OF SERVICE

I certify that on January 6, 2020, I filed the foregoing the Clerk of the Court using the CM/ECF system, which delivered copy to all counsel of record.

/s/ Anthony E. Rothert